

UNITED STATES DISTRICT COURT FOR  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

2018 BUGATTI CHIRON (VIN#: VF9SP3V34JM795083)

Defendant *In Rem*.

Civil No.:

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and 18 U.S.C. § 983, and alleges as follows:

**Nature of the Action**

1. This is a civil action *In Rem* under 18 U.S.C. §§ 981(a)(1)(A) and (C), 1956, 1957 and 1030.

**Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C.

§ 1355; and over this particular action pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 1956, 1957 and 1030.

3. Venue is proper in this district and the Court has *In Rem* jurisdiction over the defendant vehicle pursuant to 28 U.S.C. §§ 1355(b)(1)(A) because the acts and omissions giving rise to the forfeiture occurred in this district.

**The Defendant *In Rem***

4. The Defendant *In Rem* is 2018 Bugatti Chiron with vehicle identification number (VIN) VF9SP3V34JM795083, seized on June 1, 2023 at the Port of Miami, Miami, Florida.
5. The Defendant *In Rem* is within the possession, custody, or control of the United States.

**Facts**

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Irving Perez of the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations.

[INTENTIONALLY LEFT IN BLANK]

**Claim for Relief**

The United States of America respectfully requests that the Court issue a warrant of arrest of the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of August 2023.

W. STEPHEN MULDROW  
United States Attorney

/s/Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
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**VERIFIED DECLARATION**

I, Myriam Y. Fernández-González, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Customs and Border Protection (CBP) that everything contained therein is

true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 2<sup>nd</sup> day of August 2023.

/s/Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
Assistant United States Attorney

**VERIFIED DECLARATION**

I, Irving Perez, depose and say that I am a Special Agent with the Immigration and Customs Enforcement-Homeland Security Investigations (ICE-HSI) and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 1<sup>st</sup> day of August 2023.

IRVING R PEREZ-  
MELENDEZ

Digitally signed by IRVING R  
PEREZ-MELENDEZ  
Date: 2023.08.01 18:38:48 -04'00'

Irving Perez, Special Agent  
Immigration and Customs Enforcement-  
Homeland Security Investigations (ICE-HSI)